

GHAJAR EXHIBIT 33

12/5/2024

Richard Kadrey, et al. v. Meta Platforms, Inc. Sy Choudhury 30(b)(6)
Highly Confidential - Subject to Protective Order

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD KADREY, et al.,)

)

Individual and)

Representative)

Plaintiffs,)

)

v.)

)

META PLATFORMS, INC.,)

)

Defendant.)

)

Case No. 3:23-cv-03417-VC

** CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER **

Videotaped Deposition of meta Platforms, Inc.

by and through its corporate designee

SY CHOUDHURY

San Francisco, California

Thursday, December 5, 2024

Reported Stenographically by

Michael P. Hensley, RDR, CSR No. 14114

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1 point didn't -- they weren't that interested. They
2 didn't follow up.

3 Q. And were some of the partners that Meta
4 was engaging with at the time in terms of
5 negotiating licenses for acquiring text data for
6 LLM -- for its LLM still in the works at the time
7 that Meta decided to pause pursuing those licenses
8 on April 7th, 2024?

9 A. Yes.

10 Q. So it's fair to say at this time that
11 there was a market for licensing literary works;
12 correct?

13 ATTORNEY HARTNETT: Object to the form.

14 THE WITNESS: I -- I can't -- I actually
15 don't think that's the case. There was one or two
16 publishers that had a price and they were so wildly
17 off that I would not agree -- or I -- in my view,
18 that's not at market. But I'm not an economist; so,
19 you know, I just do deals for the company, and two
20 data points is not a market, especially when they're
21 wildly off.

22 BY ATTORNEY PRITT:

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1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Michael P. Hensley, Registered Diplomate

4 Reporter for the State of California, CSR No. 14114,

5 the officer before whom the foregoing deposition was

6 taken, do hereby certify that the foregoing

7 transcript is a true and correct record of the

8 testimony given; that said testimony was taken by me

9 stenographically and thereafter reduced to

10 typewriting under my direction; that reading and

11 signing was not requested; and that I am neither

12 counsel for, related to, nor employed by any of the

13 parties to this case and have no interest, financial

14 or otherwise, in its outcome.

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Michael P. Hensley, CSR, RDR

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